

# **Determination of NEPA Adequacy (DNA)**

**Palomino Valley Corrals Weed Treatments**

**DOI-BLM-NV-C020-2016-0002-DNA**

Sierra Front Field Office

Carson City

Nevada

89701

775-885-6000

## ***Determination of NEPA Adequacy (DNA)***

### **Worksheet**

U.S. Department of the Interior

Bureau of Land Management

OFFICE: Sierra Front Field Office, LLNVC02000

CASEFILE/PROJECT NUMBER: N/A

PROPOSED ACTION TITLE/TYPE: Weed Treatments at Palomino Valley Corrals

LOCATION/LEGAL DESCRIPTION: 147 acres within the north ½ Section 7, T22N, R21E

#### **Description of Proposed Action and any applicable mitigation measures.**

The Palomino Valley Corrals (PVC) proposes to manage for bare ground on its facility to remove vegetation in the parking lot and along fence lines that would otherwise pose a fire hazard when dried. Visitor safety is also a consideration as the public regularly visits the PVC and could trip on dense annual vegetation or accidentally set fire to dried weed species. Eradication of the following nuisance weeds is proposed. Annual grasses: *Bromus tectorum*, *Poa bulbosa*, *Eremopyrum triticeum*, *Hordeum murinum*. Annual forbs: *Salsola tragus*, *Sisymbrium altissimum*, *Descurainia Sophia*, *Lepidium perfoliatum*, *Chorispora tenella*, *Halogetan glomeratus*, *Chenopodium album*, *Sonchus* sp., *Ambrosia artemisiifolia*, *Anthemis cotula*, *Tribulus terrestris*, *Erodium cicutarium*. The following herbicides would be used: Garlon 4 (Triclopyr) and RoundUp Original (Glyphosate) and would be applied by a power sprayer (truck and hose). Herbicide application would be made from April through May and then again in September of each year. For both herbicides the restricted entry interval (REI) is 12 hours, after which it is safe to enter the treated areas without personal protective equipment (PPE). All herbicides would be mixed with a dye to show where treatment has occurred. A Pesticide Application Record would be completed following the treatment and submitted to the Bureau of Land Management (BLM).

#### **Land Use Plan Conformance**

LUP Name	Carson City Field Office Consolidated Resource Management Plan	Date Approved:	May 2001
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**The proposed action is in conformance with the applicable LUP because it is specifically provided for in the following LUP decisions:**

The Proposed Action described below is in conformance with the Carson City Field Office Consolidated Resource Management Plan (CRMP) (BLM 2001):

On page LSG-1:

“Maintain or improve the condition of the public rangelands to enhance productivity for all rangeland and watershed values;”

On page LSG-8:

“Application of herbicides...would be in accordance with procedures established in Bureau Manual 9222...to ensure non-impairment of other than target species.” and

On page WLD-2:

“Maintain and improve wildlife habitat, including riparian/stream habitats...”

“Maintain or improve the habitat condition of meadow and aquatic areas.”

“Maintain or improve the condition of the public rangelands so as to enhance productivity for all rangeland values (including wildlife).”

The PVC has been delineated as General Habitat Management Area (GHMA) and Other Habitat Management Area (OHMA) for the greater sage-grouse (*Centrocercus urophasianus*). This project is in conformance with the *Record of Decision and Approved Resource Management Plan, Amendments for the Great Basin Region, Including the Greater Sage-Grouse Sub-Regions of Idaho and Southwestern Montana, Nevada and Northeastern California, Oregon and Utah* (September 2015).

### **Identify applicable National Environmental Policy Act (NEPA) documents and other related documents that cover the proposed action.**

Name of Document: Carson City District, Integrated Weed Management Plan/Final Programmatic Environmental Assessment

Document No.: DOI-BLM-NV-C000-2015-0003-EA

Date of Approval: July 2015

Name of Document: Vegetation Treatments on BLM Lands in 17 Western States PEIS.

Date of Approval: June 2007

Name of Document: Vegetation Treatments on BLM Lands in 17 Western States ROD.

Date of Approval: September 2007

### **NEPA Adequacy Criteria**

**1. Is the new proposed action a feature of, or essentially similar to, an alternative analyzed in the existing NEPA document(s)? Is the project within the same analysis area, or if the project location is different, are the geographic and resource conditions sufficiently similar to those analyzed in the existing NEPA document(s)? If there are differences, can you explain why they are not substantial?**

The proposed action is to treat weedy plant species on BLM lands using herbicides that are registered with the Environmental Protection Agency and have previously been analyzed by the BLM and approved for use. The project area falls within the Carson City District (CCD), considered in the Carson City District Integrated Weed Management Plan/Final Programmatic Environmental Assessment (IWMP) (DOI-BLM-NV-C000-2015-0003-EA). There are no substantial differences between the proposed action and alternatives previously analyzed in the existing NEPA document.

**2. Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the new proposed action, given current environmental concerns, interests, and resource value?**

The range of alternatives analyzed in the three existing NEPA documents, listed on the top of page 4, are appropriate with respect to the proposed action. Under the IWMP, analysis was conducted for weed treatments with BLM-approved herbicides for areas throughout the CCD which are negatively affected by invasive non-native plant species. Various best management practices in project planning, prioritization of areas for treatment and consideration of environmental concerns were analyzed. The only difference is that the urgency to move forward with the proposed action is greater than ever before as the negative impacts to ecosystems, due to weeds, are increasing across the landscape.

**3. Is the existing analysis valid in light of any new information or circumstances (such as, rangeland health standard assessments, recent endangered species listings, updated lists of BLM sensitive species)? Can you reasonably conclude that new information and new circumstances would not substantially change the analysis of the new proposed action?**

There is no new information or circumstances that would substantially change the analysis of the proposed action. The herbicides are already analyzed and approved for use, following BLM and State of Nevada protocol. There have been no recent endangered species listings for wildlife or plant species within the CCD area and there have been no changes to the Nevada BLM sensitive species list. A new map of greater sage grouse habitat management areas does place the treatment area within two habitat management types for greater sage-grouse (GHMA and OHMA). These designated management areas did not exist at the time when the Palomino Valley Corrals were constructed. Consequently the site was built and habitat for the greater sage-grouse no longer exists. There is a general consensus of resource management specialists within federal, state and tribal agencies that the weed situation is worsening and that a coordinated weed abatement effort is needed. The BLM has completed coordination with the Nevada Department of Wildlife and Nevada State Office for greater sage-grouse on this project.

The BLM determined that this project falls under *Appendix A: Exemptions from Inventory Requirements, found in the 2014 State Protocol Agreement between the BLM Nevada and the Nevada SHPO for Implementing the National Historic Preservation Act*. This project falls under exemption #1: "Issuing permits, rights of way, or NEPA decisions where no new surface disturbance is authorized, such as power line/transmission line ROW renewals, communication site ROW renewals. . . ." Under this exemption, no cultural resources inventory is required.

**4. Are the direct, indirect, and cumulative effects that would result from implementation of the new proposed action similar (both quantitatively and qualitatively) to those analyzed in the existing NEPA document?**

The direct, indirect and cumulative effects from implementation of the proposed action are similar to those analyzed in existing NEPA documents. Adherence to BLM and State of Nevada weed treatment protocols provide an additional level of environmental protection when implementing the proposed action.

**5. Are there public involvement and interagency reviews associated with existing NEPA document(s) adequate for the current proposed action?**

On April 28, 2014 the IWMP was reviewed by the BLM's interdisciplinary team. Issues that were discussed during this meeting included:

How would site-specific treatments be addressed under the National Historic Preservation Act (NHPA)?

How would compliance under the Endangered Species Act (ESA) be completed when site-specific locations are identified for treatment?

Additional meetings with the BLM's interdisciplinary team were held on January 26 and February 9, 2015.

On January 15 and 21, 2015 the BLM sent consultation initiation letters to all tribes that have affiliation with public lands in the CCD including: the Bridgeport Indian Colony; Fallon Paiute-Shoshone Tribe; Lovelock Indian Colony; Pyramid Lake Paiute Tribe; Reno-Sparks Indian Colony; Susanville Indian Rancheria; Walker River Paiute Tribe; Washoe Tribe of Nevada and California; Yerington Paiute Tribe; and Yomba Shoshone Tribe. On May 14, 2015, the BLM sent letters to all tribes notifying them of the opportunity to comment on the draft programmatic environmental assessment. On May 15, 2015, the BLM sent letters to all tribal environmental planners/managers notifying them of the opportunity to comment on the draft programmatic environmental assessment. The BLM did not receive any comments from the tribes.

On May 18, 2015 the BLM initiated a 45-day public review and comment period. A news release announcing the comment period had been released by the BLM on May 15, 2015. The news release appeared High Beam (internet site) on May 15, 2015 and in the Reno Gazette-Journal on May 27, 2015. Letters were sent to 50 individuals, 34 organizations/companies, 10 tribes, and nine agencies including the Nevada State Clearinghouse on the project mailing list. The public comment period closed on July 1, 2015.

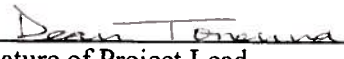
The BLM received eight comment letters or emails on the draft documents. Summarized responses are provided in Appendix F (of the PEA), Comments and Responses to Comments.

**BLM Staff Consulted**

<u>Name</u>	<u>Title</u>	<u>Resource/Agency Represented</u>
Rachel Crews	Archaeologist	Cultural Resources
Dean Tonenna	Botanist	BLM sensitive plant species
Pilar Ziegler	Wildlife Biologist	BLM sensitive animal species

## Conclusion

Based on the review documented above, I conclude that this proposal conforms to the applicable land use plan and that the NEPA documentation fully covers the proposed action and constitute BLM's compliance with the requirement of NEPA.

  
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Signature of Project Lead

Date 10/26/15

  
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Signature of Sierra Front Field Office NEPA Coordinator

Date 10/23/2015

  
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Signature of Responsible Official  
Sierra Front Field Office

Date 10/28/2015

### Note:

See accompanying Decision Record for appeal information.